

# TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman  
Lynn Greer, Director  
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460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

## MEMORANDUM

**TO:** K. David Waddell  
Executive Secretary

**FROM:** Lewis T. De Board  
Consumer Services Division

**DATE:** February 11, 2001

**SUBJECT:** Complaint Relative To Telecommunications Traffic Transport  
By Citizens Communications To Aeneas Communications,  
LLC.

02-00438

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The TRA Consumer Services Division ("CSD" or "Staff") was contacted by Aeneas Communications ("Aeneas") regarding a problem it was experiencing with Citizens Communications ("Citizens") in Weakley County.<sup>1</sup> Specifically, Aeneas complained that Citizens' customers in Martin, Tennessee were unable to complete calls to its customer, an Internet Service Provider ("ISP"), in Greenfield, Tennessee. Aeneas stated that since the calls are originated and terminated in Weakley County, the calls should be sent to its switch for delivery to its customer, and be toll free.

To ensure this was not a typical county-wide calling problem, the staff checked the Local Exchange Routing Guide for the assignment location of the Central Office Code ("NXX") for the telephone number involved, and the TAR Code information to ensure Aeneas had the number coded for the proper county. It was found that the NXX involved was assigned to Aeneas in the BellSouth Greenfield Central Office, and the TAR Code was correct for Weakley County. This information proved that these calls are county-wide calls. The staff requested the positions of the parties regarding the situation, but after several attempts could not mediate an acceptable resolution to the problem. T.C.A. § 65-4-119 instructs the staff investigating an informal complaint to refer the complaint to the Authority should staff be unable to resolve it.

Aeneas requested that the county-wide calls to its customer, an ISP, be sent over the BellSouth toll trunk to the tandem switch in either Memphis or Jackson. These are the only two BellSouth tandem switches in West Tennessee. The staff confirmed that use of a tandem switch is necessary for calls to be transferred to a CLEC absent interconnection agreements because tandem switches are gateways between Incumbent Local Exchange

<sup>1</sup> CSD Complaint File No. 02-0125

Memorandum  
February 11, 2001  
Page 2

Carriers and other telecommunications service providers. Staff found that Aeneas has an interconnection agreement with BellSouth due to its presence within BellSouth's territory, but that Aeneas does not have an interconnection agreement with Citizens.

According to Aeneas, Citizens wants it to purchase an independent trunk group between the two companies in order to connect traffic to Aeneas rather than using the toll trunk and BellSouth's tandem switch. Staff understands that if Aeneas established an independent trunk group with Citizens, calls would be directly connected and the need to route calls through a tandem would be eliminated. Aeneas states it is reluctant to establish a trunk group, partly due to the expense, but also because it expects its usage within Weakley County from Citizens customers to be minimal.

Aeneas provided information that toll trunks to access the tandem switches were initially established for toll traffic. With the advent of cellular services and competition, toll trunks to tandem switches are sometimes used for non-toll traffic as well. According to Aeneas the other companies in West Tennessee are successfully using the toll trunks to access BellSouth's tandem switch for telecommunications traffic delivery to Aeneas

When contacted about Aeneas' complaint, Citizens responded that they were transporting its customers' calls to the BellSouth Greenfield Central Office over their Extended Area Service ("EAS") trunks. Citizens states this is the proper method for routing local traffic between the Martin and Greenfield central offices. Citizens reports that calls to Aeneas' customers are being dropped<sup>2</sup> in the Greenfield Central Office, and that BellSouth will only accept and process traffic to Aeneas' customers if that traffic is delivered to one of its tandem switches. Staff verified that the Greenfield Central Office (or end office) switch can only process and terminate traffic to individual access lines. Citizens denies that it is dropping or blocking calls from its customers to Aeneas' customers. Citizens stresses it is handling calls to Aeneas' customers in the identical manner it handles calls between its own customers.

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<sup>2</sup> A dropped call is one that is originated, processed by one or more switches, but is not delivered to the intended called end-user, or terminated.

Memorandum  
February 11, 2001  
Page 3

Citizens further states that they have no agreement with Aeneas for transport or exchange of traffic, and that it has not received an Access Service Request from Aeneas requesting access at its Martin central office. Citizens states that absent an agreement it does not feel obligated to route calls to Aeneas' customers over a common trunk group to BellSouth's tandem in Memphis or Jackson. Citizens states that it is not aware of any Authority ruling that would require them to route local traffic over its toll network at no charge. Citizens further states that the potential for blockage on the toll network is increased because of the added usage of ISP traffic. Citizens states that if Aeneas wants its traffic routed over the toll network, it needs to either establish trunk groups, or negotiate an agreement that properly compensates Citizens for the exchange of traffic.